

**IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Tamille Williams,

Plaintiff,

vs.

Chengliang Huang and East West Wholesale,
Inc.,

Defendants.

Case No.: **6:24-CV-04957-DCC**

**PLAINTIFF'S RULE 26(A)(2)
DISCLOSURES**

Plaintiff Tamille Williams hereby submits her expert disclosure as required by Federal Rule of Civil Procedure 26(a) and the Court's Case Management and Scheduling Order. Plaintiff has not retained any expert witnesses pursuant to Rule 26(a)(2)(B) at this time.

Plaintiff reserves the right to call her treatment providers as witnesses. Plaintiff anticipates that her treatment providers will qualify as experts by knowledge, skill, experience, training, or education, and Plaintiff reserves the right to elicit testimony regarding each provider's opinions, if any, regarding the cause, diagnosis, treatment, and prognosis of Plaintiff's injuries. Plaintiff's treating providers who may be called testify at trial and are known at this time are as follows:

1. Neel Patel, MD

Dr. Patel is a board-certified radiologist who has read the magnetic resonance imaging of Plaintiff's cervical and lumbar spine. Dr. Patel is expected to testify regarding his opinions of the imaging consistent with Dr. Patel's medical records.

2. Tayeb Rahim, MD

Dr. Rahim is a board-certified radiologist who has read the magnetic resonance imaging of Plaintiff's brain. Dr. Rahim is expected to testify regarding his opinions of the imaging consistent with Dr. Rahim's medical records.

3. Jeremy Royal, MD

Dr. Royal is a board-certified radiologist who has read the magnetic resonance imaging of Plaintiff's right shoulder. Dr. Royal is expected to testify regarding his opinions of the imaging consistent with Dr. Royal's medical records.

4. Brooke A. Ellison, PA

Ms. Ellison is an ER Physician's Assistant who provided treatment for Plaintiff's injuries immediately following this crash. Ms. Ellison is expected to testify regarding the nature and cause of Plaintiff's injuries, as well as her treatment of Plaintiff's injuries and her recommendations for future care, consistent with Ms. Ellison's medical records.

5. Michael Ferrell, MD

Dr. Ferrell is a board-certified orthopedic surgeon who has provided treatment for Plaintiff's right shoulder injury following this crash. Dr. Martin is expected to testify regarding his treatment of Plaintiff's cervical injury, his opinions regarding the causation of Plaintiff's shoulder injury, and his recommendations for future care, consistent with Dr. Martin's medical records.

6. Bruce M. Hairston, MD

Dr. Hairston is a board-certified pain medicine physician who has provided treatment for Plaintiff's spine injuries following this crash. Dr. Hairston is expected to testify regarding his treatment of Plaintiff's spine injuries, his opinions regarding the causation of Plaintiff's spine injuries, and his recommendations for future care, consistent with Dr. Hairston's medical records.

Because Plaintiff's medical care is ongoing, Plaintiff reserves the right to supplement her list of treatment providers and to call any treatment provider as a witness at the trial of this case. Plaintiff also reserves the right to supplement this disclosure later should the case develop in such a way to warrant additional expert testimony on Plaintiff's behalf. Defendants' have not provided their discovery responses prior to Plaintiff's Expert Disclosure deadline, and Defendants' depositions have not yet been taken. Plaintiff further reserves the right to elicit expert testimony from individuals named as experts by other parties, as well as other witnesses later identified who may qualify as experts under the Rules of Evidence.

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